

## **REMARKS**

Reconsideration of the present application is respectfully requested. Claims 1-22 are pending. No claims have been added, cancelled, or amended.

### **Allowable Subject Matter**

Examiner objected to claims 3-6 and 8-15 as being dependent upon a rejected base claim, and indicated that claims 16-17 and 19 are allowable.

Applicant thanks the Examiner for the careful examination indicating this allowable subject matter.

### **Claim rejection under 35 U.S.C. §102(b)**

#### **Claims 1-2, 7**

Examiner rejected claims 1, 2 and 7 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,956,470 to Eschbach.

Eschbach discloses separating the detection of image jaggedness from the processing required for smoothing an image. The input halftone image data enters a mask first in first out (FIFO) through an ink filter and data FIFOs. A resolution enhancement filter connected to the data FIFOs receives the image input data. The image data is processed through a buffer to an image enhancement module to provide image jaggedness detection signals, which signal the image enhancement module that the input image data requires a switch in halftone structure. The image enhancement module processes the image data from the buffer under the direction of the resolution enhancement filter.

Claim 1 recites:

A method for de-screening a halftone image, comprising:  
performing a screen conversion filter upon a scanned  
representation of said halftone image to produce an intermediate image;  
and  
performing a line smoothing filter upon said intermediate image to  
produce an output image.

(Emphasis Added). Eschbach does not teach or suggest performing a screen conversion filter upon a scanned representation of the halftone image to produce an intermediate image. As discussed earlier, Eschbach discloses that a halftone image is processed through a buffer to an image enhancement module to provide image jaggedness detection signals. Eschbach is silent about performing a screen conversion filter upon a scanned representation of the halftone image.

Thus, claims 1,2 and 7 are not anticipated by Eschbach.

#### Claim 18

Examiner rejected claim18 under 35 U.S.C. §102(b) as being anticipated by Eschbach. Claim 18 recites:

computer-readable medium having stored thereon sequences of instructions, the sequences of instructions including instructions which, when executed by a processor, causes the processor to perform various processing, the sequences of instructions comprising:  
a first sequence to perform a screen conversion filter upon a  
scanned representation of a halftone image to produce an intermediate  
image; and  
a second sequence to perform a line smoothing filter upon said intermediate image to produce an output image.

(Emphasis Added). As discussed earlier, Eschbach does not teach or suggest performing a screen conversion filter upon a scanned representation of the halftone image to produce an intermediate image.

Thus, claim 18 is not anticipated by Eschbach.

Claims 20-22

Examiner rejected claims 20-22 under 35 U.S.C. §102(b) as being anticipated by Eschbach. Claim 20 recites:

A system for de-screening a halftone image, comprising:  
a memory to store an input image from a halftone print; and  
a processor to perform a screen conversion filter upon said input  
image and create an intermediate image, and to perform a  
line smoothing filter upon said intermediate image and  
create an output image.

(Emphasis Added). As discussed earlier, Eschbach does not teach or suggest performing a screen conversion filter upon a halftone image to create an intermediate image. Thus, claims 20-22 are not anticipated by Eschbach.

## CONCLUSION


Applicant respectfully submits that in view of the discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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